

# **EXHIBIT 2**

\*\* C O N F I D E N T I A L \*\*

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION

VIRTAMOVE, CORP., )  
)  
PLAINTIFF, ) CASE NO.  
) 7:24-CV-00030-DC-DTG  
VS. )  
)  
AMAZON.COM, INC.; )  
AMAZON.COM SERVICES LLC; )  
AND AMAZON WEB SERVICES, )  
INC., )  
)  
DEFENDANT. )  
\_\_\_\_\_)

\*\* C O N F I D E N T I A L \*\*

(FOLLOWING TRANSCRIPT AND EXHIBITS HAVE BEEN DESIGNATED  
CONFIDENTIAL)

VIDEOTAPED REMOTE ZOOM RULE 30(B)(6) DEPOSITION  
AMAZON DEFENDANTS - RAVIPRASAD MUMMIDI  
FRIDAY, SEPTEMBER 13, 2024

JOB NO. 6916325  
REPORTED BY: DAYNA HESTER, C.S.R. 9970

1 CONFIDENTIAL VIDEOTAPED REMOTE ZOOM RULE 30(B)(6)  
2 DEPOSITION OF AMAZON DEFENDANTS - RAVIPRASAD  
3 MUMMIDI, TAKEN ON BEHALF OF PLAINTIFF VIRTAMOVE,  
4 CORP., AT 10:08 A.M., FRIDAY, SEPTEMBER 13, 2024,  
5 WITH THE WITNESS, COURT REPORTER, AND VIDEOGRAPHER  
6 APPEARING REMOTELY VIA ZOOM VIDEOCONFERENCE, BEFORE  
7 DAYNA HESTER, C.S.R. NO. 9970.

8  
9 APPEARANCES OF COUNSEL:

10 FOR PLAINTIFF VIRTAMOVE, CORP.:

11 RUSS AUGUST & KABAT

12 BY: QI (PETER) TONG, ESQ.

(PRESENT VIA ZOOM VIDEOCONFERENCE)

13 BY: MACKENZIE PALADINO, ESQ.

(PRESENT VIA ZOOM VIDEOCONFERENCE)

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17 FOR DEFENDANTS AMAZON.COM, INC.; AMAZON.COM SERVICES  
18 LLC; AND AMAZON WEB SERVICES, INC.; AND THE WITNESS:

19 KNOBBE MARTENS OLSON & BEAR

BY: JEREMY A. ANAPOL, ESQ.

(PRESENT VIA ZOOM VIDEOCONFERENCE)

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22  
23 -- APPEARANCES CONTINUED ON NEXT PAGE --

24 APPEARANCES OF COUNSEL (CONTINUED):  
25

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1 ALSO PRESENT :

2 JILL WARREN, VIDEOGRAPHER

(PRESENT VIA ZOOM VIDEOCONFERENCE)

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## I N D E X

DEPONENT	EXAMINATION	PAGE
RAVIPRASAD MUMMIDI		
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## QUESTIONS INSTRUCTED BY COUNSEL NOT TO ANSWER

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## E X H I B I T S

EXHIBIT NO.	PAGE	DESCRIPTION
EXHIBIT 1	10	FILE TITLED "EXHIBIT 0001 - DECL OF RAMU PANAYAPPAN ISO %5B31%5D MTT.PDF"
EXHIBIT 2	11	FILE TITLED "EXHIBIT 0002 - AMENDED NTC 30B6 DEPO TO AMAZON.PDF"
EXHIBIT 3	55	FILE TITLED "EXHIBIT 0003 - AMAZON MOTION TO DISMISS OR TRANSFER CASE.PDF"

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1 1 ZOOM VIDEOCONFERENCE, CALIFORNIA  
2 2 FRIDAY, SEPTEMBER 13, 2024; 10:08 A.M.  
3 3  
4 4 \*\* C O N F I D E N T I A L \*\*  
5 5 (FOLLOWING PAGES HAVE BEEN DESIGNATED  
6 6 CONFIDENTIAL)  
7 7 10:08  
8 8 THE VIDEOGRAPHER: Good morning. 10:08  
9 10:08 9 We are on the record at  
a.m. Pacific 10:08  
10  
10 10 time on Friday September 13th, 2024. 10:08  
11  
11 11 Please note this deposition is being 10:08  
12  
12 12 conducted remotely using virtual technology. 10:08  
13  
13 13 Quality of recording depends on the participants's 10:08  
14  
14 14 quality of equipment and internet connections. The 10:08  
15  
15 15 deponent and what is heard on screen will be 10:08  
16  
16 16 recorded. 10:08  
17  
17 17 Audio and video recording will continue to 10:08  
18  
18 18 take place until all parties agree to go off the 10:08  
19  
19 19 record. 10:09  
20  
20 20 This is the beginning of Media Number 1 of 10:09  
21  
21 21 the video-recorded deposition of Raviprasad Mummidi 10:09  
22  
22 22 taken by counsel for plaintiff in the matter of 10:09  
23  
23 23 VirtaMove Corp, Plaintiff, versus Amazon.com, Inc., 10:09  
24  
24 24 et al., defendants, filed in the United States 10:09  
25  
25 25 District Court for the Western District of Texas, 10:09

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1 Midland/Odessa Division. Case 10:09  
2 Number 7:24-CV-00030-DC-DTG. 10:09  
3 My name is Jill Warren, and I am the 10:09  
4 videographer. 10:09  
5 The court reporter is Dayna Hester, and we are 10:09  
6 representing Veritext Legal Solutions. 10:09  
7 If there are any objections to proceeding, 10:09  
8 please state them at the time of your appearance beginning 10:09  
9 with the noticing attorney, please state your appearance. 10:09  
10 MR. TONG: This is Peter Tong from Russ August & 10:09  
11 Kabat. And with me in the room is my associate Mackenzie 10:10  
12 Paladino. 10:10  
13 MR. ANAPOL: Jeremy Anapol of Knobbe Martens 10:10  
14 Olson & Bear on behalf of defendants and the witness. 10:10  
15 THE VIDEOGRAPHER: Thank you. 10:10  
16 The court reporter will administer the oath and 10:10  
17 counsel may proceed. 10:10  
18 THE REPORTER: Okay. One second.  
19 This is a federal case, so I do have a read-on.  
20 My name is Dayna Hester. This statement is to  
21 acknowledge my obligations pursuant to Federal Rules of  
22 Civil Procedure.  
23 Rule 30(b), Subsection 5(a). My business  
24 address is 707 Wilshire Boulevard, Los Angeles,  
25 California. The videographer has stated the additional

1 required information.

2 Rule 30(b), Subsection 5(c). Upon completion of  
3 the deposition, if there is a stipulation about the  
4 custody of the transcript or other pertinent matters off  
5 the record, I will recite such stipulation(s) on the  
6 record. Additionally, the videographer will read-off when  
7 the deposition concludes.

8 So with this being said, I will now swear in the  
9 witness.

10 Please raise your right hand.

11 THE WITNESS: [Witness did as requested].

12 THE REPORTER: Do you affirm the testimony you  
13 are about to give in the cause now pending will be the  
14 truth, the whole truth, and nothing but the truth? 10:11

15 THE WITNESS: I do. 10:11

16 THE REPORTER: Thank you. 10:11

17

18 RAVIPRASAD MUMMIDI

19 having been first duly sworn, was  
20 examined and testified as follows:

21

22 EXAMINATION

23 BY MR. TONG:

24 Q. Good morning. 10:11

25 A. Good morning. 10:11

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1 Q. Could you please state and spell your full 10:11  
2 name for the record. 10:11  
3 A. Raviprasad Mummidi. 10:11  
4 Q. And could you please spell that. 10:11  
5 A. R-A-V-I-P-R-A-S-A-D, M-U-M-M-I-D-I. 10:11  
6 Q. And I think you had said earlier it would 10:11  
7 be okay if I just call you "Ravi"? 10:11  
8 A. That's correct. 10:11  
9 Q. Can I do that? 10:11  
10 Thank you. 10:11  
11 Have you ever been deposed before, Ravi? 10:11  
12 A. No. 10:11  
13 Q. So I'm going to go over a few ground rules 10:11  
14 as to how this deposition is going to proceed, then. 10:11  
15 So I'm going to ask you a series of 10:11  
16 questions, and you are under the obligation to 10:12  
17 answer them truthfully and fully under oath. 10:12  
18 From time to time your counsel may object 10:12  
19 to my questions. If that is the case, you must 10:12  
20 still answer my question unless he directs -- 10:12  
21 directly instructs you not to answer the question. 10:12  
22 A. Okay. 10:12  
23 Q. From time to time, if we need to take a 10:12  
24 break, that is okay. We can go off the record and 10:12  
25 take a break. Just let me know. 10:12

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1 depends on just the entire lifetime of -- of a 12:58  
2 project that the team would actually work on it. 12:58  
3 Q. Then would the lifetime be about from 2019 12:58  
4 to 2022? 12:58  
5 A. Yes. So -- so, initially, I was working 12:58  
6 with them to be able to get them onboard. And then 12:58  
7 it was when more projects started kicking in. 12:58  
8 That's basically when it became more. 12:58  
9 Q. And during the time you worked with the 12:58  
10 EMP team, do you remember anybody from the EMP team 12:58  
11 being in Texas? 12:58  
12 A. I personally do not know of anyone. 12:58  
13 Q. And do you know of anybody who still works 12:58  
14 at Amazon who knows more about EMP than you do? 12:58  
15 MR. TONG: Objection. Leading. 12:58  
16 THE WITNESS: I do not think so. 12:59  
17 BY MR. ANAPOL: 12:59  
18 Q. And let's go back to Ramu's declaration, 12:59  
19 Exhibit 1. And could you look at Paragraph 4? 12:59  
20 A. Yeah. 12:59  
21 Q. Other than the people listed in 12:59  
22 Paragraph 4, are you aware of anyone who has access 12:59  
23 to EMP source code? 13:00  
24 A. I do not know. 13:00  
25 Q. Were you aware that the people listed in 13:00

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1 Paragraph 4 had access to EMP's source code? 13:00

2 A. Yeah. 13:00

3 MR. ANAPOL: Pass the witness. 13:00

4 13:00

5 FURTHER EXAMINATION 13:00

6 BY MR. TONG: 13:00

7 Q. So would you be Amazon's witness who has 13:00

8 the most knowledge regarding EMP's operation out of 13:00

9 the people listed in Paragraph 4? 13:01

10 A. I believe I am. 13:01

11 Q. And what relevant testimony about EMP and 13:01

12 its technical operation did you expect to give at 13:01

13 the trial in this case, if any? 13:01

14 MR. ANAPOL: Calls for a legal conclusion. 13:01

15 Calls for speculation. Incomplete hypothetical. 13:01

16 THE WITNESS: I have nothing to add, no. I've 13:01

17 given you all the data. 13:01

18 BY MR. TONG: 13:01

19 Q. So to be clear here, your testimony at 13:01

20 trial is going to be limited to the things that you 13:01

21 have testified about today in this deposition? 13:01

22 MR. ANAPOL: That's obviously not true. 13:01

23 MR. TONG: I object to your speaking objection. 13:01

24 THE WITNESS: Well, based on the questions that 13:02

25 you've -- that are asked and answered. So if you ask 13:02

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1 STATE OF CALIFORNIA )  
2 COUNTY OF LOS ANGELES ) SS.  
3

4 I, Dayna Hester, C.S.R. No. 9970, in  
5 and for the State of California, do hereby certify:

6 That, prior to being examined, the witness named  
7 in the foregoing deposition was by me duly sworn to  
8 testify to the truth, the whole truth, and nothing but the  
9 truth;

10 That said deposition was taken down by me in  
11 shorthand at the time and place therein named and  
12 thereafter reduced to typewriting under my direction, and  
13 the same is a true, correct, and complete transcript of  
14 said proceedings;

15 That if the foregoing pertains to the original  
16 transcript of a deposition in a Federal Case, before  
17 completion of the proceedings, review of the transcript  
18 { } was { } was not required;

19 I further certify that I am not interested in  
20 the event of the action.

21 Witness my hand this 20 day of September,  
22 2024.

23 

24 Certified Shorthand Reporter  
25 for the State of California

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